

*Before the*  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554

In the Matter of	)	
	)	
Review of the Commission's	)	MM Docket No. 98-204
Broadcast and Cable Equal Employment	)	
Opportunity Rules and Policies	)	
	)	

**MOTION FOR EXTENSION OF TIME**

Pursuant to Section 1.46 of the Commission's rules, 47 C.F.R. § 1.46, the National Organization for Women, the Office of Communication of the United Church of Christ, Inc., the Philadelphia Lesbian and Gay Task Force, the Women's Institute for Freedom of the Press, and the Minority Media and Telecommunications Council (NOW *et al.*), by their attorneys, the Institute for Public Representation (IPR), file this Motion requesting that the Commission extend the period for all interested parties to file comments in the above-captioned proceeding from July 14, 2004 to July 29, 2004, and allow until August 9, 2004 for reply comments. This brief extension of time would permit more complete responses on the issues raised in this proceeding and will not prejudice any interested parties.

On June 4, 2004, the Commission released its Third Report and Order and Fourth Notice of Proposed Rulemaking in the ongoing Review of the Commission's Broadcast and Cable Equal Employment Opportunity Rules and Policies (MM Docket No. 98-204) (*FNPRM*). The public interest organizations listed above have a vital interest in participating in this docket and would like to provide helpful offerings to this important debate over the confidentiality of EEO forms. The Commission has provided only 21 days to comment on a difficult issue of statutory interpretation and a brief extension of time is requested in order to permit various interested parties to work together to formulate an approach that may successfully resolve the issue.

The ability of NOW *et al.* and their counsel, IPR, to devote adequate time and resources to this proceeding, however, is limited by their desire to participate in other important FCC rulemaking proceedings. IPR, a public interest law firm with limited staff, is currently dedicating a large portion of its time and resources to several other vitally important issues at the Commission. In addition to the *FNPRM*, the Commission seeks comment on Ways to Further Section 257 Mandate and to Build on Earlier Studies (DA 04-1690) with a July 22, 2004 comment deadline and August 6, 2004 reply comment deadline; reply comments in the Digital Audio Broadcasting docket (MM Docket No. 99-325) are due July 16, 2004; reply comments regarding IP-Enabled Services (WC Docket No. 04-36) are due July 14, 2004; and comments in the Lifeline and Link-Up proceeding (WC Docket No. 03-109) are due August 23, 2004. We thank the Commission for requesting comment in several proceedings that provide excellent opportunity for public interest involvement and request the agency's indulgence for a brief extension in one of those proceedings.

No prejudice to any party will result from this modest extension. Broadcasters and MVPDs do not have to alter any of their current information-gathering or reporting practices in order for the Commission to accommodate a brief extension. FCC Forms 395-A and 395-B will not be filed by any broadcaster or cable operator before August 9, 2004, when reply comments would be submitted.

Grant of additional time requested would allow all interested parties a meaningful opportunity to respond to issues raised in the *FNPRM*, and would assist the Commission in reaching its decision based on a complete record.

For the foregoing reasons, NOW *et al.* request that the Commission extend the comment and reply comment periods in the above-captioned docket to July 29, 2004 and August 9, 2004 respectively.

Respectfully Submitted,

/s/  
Karen Henein, Esq.  
Institute for Public Representation  
Georgetown University Law Center  
600 New Jersey Avenue, N.W.  
Washington, D.C. 20001  
(202) 662-9535

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Counsel for NOW *et al.*